

ENGINEERING ANALYSIS

Tiffin Motorhomes, Inc.
Facility Number 710-0039

On October 25, 2016, the Department received an application from Tiffin Motorhomes for a new facility in Winfield. A revised application was received on December 6, 2016, and synthetic minor permit limits were requested on December 8, 2016. This new motor home manufacturing facility will be in an existing building leased from the city. The SIC Code for motor homes manufactured on existing chassis is 3716.

Emissions

Air emissions will be from two booths used to coat cabinets and other wood components. This facility will also have an exterior paint line with two booths. Tiffin has requested emission limits of 95 tons of volatile organic compounds, 24 tons of hazardous air pollutants, and 9.9 tons of any single hazardous air pollutant in any 12 month period.

NSPS/NESHAPS

There are no New Source Performance Standards that apply to the operations described in the application. This facility is not subject to the National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR 63 subpart JJ, because it has requested permit limits below the major source thresholds as defined in 40 CFR 63 subpart A. Because Tiffin will be spray coating a motor vehicle at an area source of HAP, this facility will be subject to 40 CFR 63 subpart HHHHHH, the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. However, Tiffin may petition the EPA Administrator for an exemption because the coatings applied do not contain any of the target HAPs. This federal standard has not been adopted by the Department.

PSD

This facility is not subject to PSD because potential annual emissions are less than 250 tons, and motor home manufacturing is not a source listed in ADEM Code R. 335-3-14-.04.

CTG

The proposed source is not subject to ADEM Admin Code R. 335-3-6 because potential VOC emissions are less than 100 tons per year.

Class I Area

Winfield is approximately 50 kilometers south west of the Sipsey Wilderness Area, the closest Class I Area. The proposed permit should not have a significant effect on the air quality in this Class I area because this is a minor source.

Air Toxics

Air toxics modeling showed that the maximum one hour concentrations of any air toxics at the property line is expected to be less than the TLV/40.

State Regulations

Filters will be installed on the paint booths. This should ensure compliance with the opacity and particulate limits of ADEM Code R. 335-3-4. The motorhomes will be built on new chassis built by other companies, which are expected to meet the motor vehicle emission control requirements of ADEM Code R. 335-3-9.

Public Notice

Public notice is required because this is a new facility.

Recommendations

I recommend issuing the attached draft Synthetic Minor Operating Permit, pending payment of the permit fee and the 15 day public comment period. The proposed facility should be able to comply with all applicable state and federal air regulations.

Hal Brock
Chemical Branch
Air Division

January 13, 2017

Date